



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JMH/FJN/MAA/SAC
F. #2019R00929

*271 Cadman Plaza East
Brooklyn, New York 11201*

August 12, 2022

By ECF and USAFx

John Carman, Esq.
666 Old Country Road
Garden City, NY 11530
Email: john@johncarmanlaw.com

Re: United States v. Baimadajie Angwang
Criminal Docket No. 20-442 (EK)

Dear Mr. Carman:

Enclosed please find discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This production supplements the materials provided on December 23, 2020, and January 13, January 27, February 4, February 23, 2021, April 22, 2021, February 10, 2022, July 25, 2022, and July 29, 2022. The government also requests reciprocal discovery from the defendant.

The material enclosed is being produced to you subject to the discovery protective order entered by the Court on November 24, 2020. See ECF No. 28 ("the Protective Order"). The materials are being provided to you via the USAFx platform. Please contact us if you have any issues accessing the materials.

The folder bearing Bates number ANGWANG-003191 contains additional employment records and related documentation obtained from the NYPD.

The folder bearing Bates number ANGWANG-003192 contains additional documentation of the search of your client's residence on September 21, 2020, including photographs and a photograph log. The log has previously been provided to you (see ANGWANG-000313 through ANGWANG-000321), and is being provided here for convenience.

The folder bearing Bates number ANGWANG-003193 contains surveillance photographs and three videos taken of your client on or about January 16, 2020.

The documents bearing Bates numbers ANGWANG-003194 through ANGWANG-003275 are draft translations of chat content and audio files involving the defendant and PRC Official #2, taken from the iPhone seized on the date of his arrest; a forensic copy of that iPhone has previously been provided to you. See, e.g., ANGWANG-000308 (search inventory), ANGWANG-001459 (hard drive containing forensic copies). Please note that the government reserves the right to revise or replace these draft transcripts ahead of trial. Please note that these documents are designated “Sensitive Discovery Material” as that term is defined in the Protective Order.

The documents bearing Bates numbers ANGWANG-003276 through ANGWANG-003283 are subscriber records for a T-Mobile telephone number associated with the defendant. The business records certification for this subscriber record appears at ANGWANG-003277, and the government hereby provides written notice pursuant to Federal Rule of Evidence 902(11) that it intends to use this certification at trial.

The government also encloses a letter containing additional information, bearing Bates number ANGWANG-003284 through ANGWANG-003285. This document is designated "Sensitive Discovery Material" as that term is defined in the Protective Order.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/
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Scott A. Claffee
Trial Attorney
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Enclosures (via USAFx)

cc: Clerk of the Court (EK) (by ECF) (without enclosures)